

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BRATTA TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T5-1, 2, 4, AND 5)
(January 31, 2012)**

United States Postal Service witness Bratta (USPS-T-5) provides responses to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, dated January 17, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY

APWU/USPS-T5-1 On page 4 of your testimony you state “[s]taffing is developed at each facility based on the equipment inventory and its utilization. Each type of equipment has a prescribed number of annual workhours allocated for preventive, corrective, and operational maintenance.”

- a) How are the allocated workhours determined?
- b) How often are these allocated workhours revised?
- c) What causes a revision to the workhours allocation to be needed?

RESPONSE:

a) Please see USPS Library References USPS-LR-N2012-1/28, 29, 30, and 59.

b-c) The revision of workhours is subject to management discretion, which is based on factors which include the change in life or use of a component of the equipment.

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APWU/USPS-T5-2 On page 14 of your testimony you state “[t]he current fleet of mail processing equipment is in excess of 10,000 units. Under Network Rationalization, the total number of units could be as low as 5,000 units.”

- a) What circumstances are required to get to the total number of units as low as 5,000?
- b) What is the likelihood of these circumstances coming to pass?
- c) What is the expected number of units after Network Consolidation?

RESPONSE:

a) The total number of units will diminish as the Postal Service experiences an increase in productivity and usage for individual machines. The closure of processing facilities and the resulting removal of equipment will also contribute to a reduction in the total number of units.

b-c) The actual number of units depends upon the results of AMP studies and implementation of the Network Rationalization Initiative.

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APWU/USPS-T5-4 On page 15 of your testimony you state “[t]his estimate is partially contingent on new staffing criteria based on improvements in work practices.” Please explain what the new staffing criteria will be and identify and explain the improvements in work practices.

RESPONSE:

In the closing sites, virtually all mail processing equipment will be eliminated, resulting in a change in the status of the site from maintenance-capable to non-maintenance-capable. The improvement in work practices refers to changes in mail processing utilization and the resulting need for maintenance staffing.

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APWU/USPS-T5-5 What portion of total utility consumption in a facility does mail processing equipment account for?

RESPONSE:

Utility consumption varies by facility. Please see section IV.B.4 of my testimony.